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## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BRUCE HALLETT,

Plaintiff,

-against-

STUART DEAN CO., INC., ADRIENE BAILEY, individually, THOMAS BROWN, individually, MARGARET CULLEN, individually, SCOTT DAY, individually, CHRIS DEGAN, individually, CATHLEEN individually, SCOTT DEGAN-NIKAS, individually, TIMOTHY HALSTEAD, KRISTEN SHEA, individually, and SCHORP, individually,

Civ. No.: 1:20-cv-03881 (JSR)

Defendants.

## PROPOSED ORDER PURSUANT TO FEDERAL RULE OF EVIDENCE 502(d)

## Hon. Jed S. Rakoff, United States District Judge:

The production of privileged or work-product protected documents, electronically stored information ("ESI") or other information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

SO ORDERED THIS 30 DAY OF October, 2020.

Hon. Jed S. Rakofi V United States District Judge